



December 22, 1999
HAND DELIVERY

Mr. Frank Faranca
Case Manager
NJDEP
Division of Responsible Party Site Remediation
Bureau of Federal Case Management
CN 028
Trenton, NJ 08625-0028

RE: NJPDES-DGW Permit 0086487 Effective January 1, 1996

Dear Mr. Faranca:

Two copies of the Discharge to Groundwater Report consisting of one (1) T-VWX-014, seven (7) VWX-015 Groundwater Analysis – Monitoring Well reports and report Sections 1.0 through 7.0 for the October through December 1999 quarter are enclosed.

Detection Monitoring was performed in accordance with Part 4-DGW Table 2, using the Ground Water Sampling and Analysis Plan approved in April 1996.

Lenox inspection logs were reviewed and a summary of the logs for the quarter is enclosed.

As requested in your letter dated August 4, 1999, Lenox has conducted a statistical analysis of the ground water TCE results from the five (5) sentinel wells over the eight (8) sampling quarters ending April 1999 and rolled the analysis forward two quarters to cover the October 1999 data using the "Mann-Whitney U-Test". The calculations and results are attached. The null-hypothesis is accepted for sentinel wells MW-75, MW-76, MW-77, MW-78 and MW-79A and we cannot conclude that the TCE concentrations are decreasing for the fourth quarter's data set. Lenox will continue to perform this statistical analysis for a total of four (4) quarters. However, these wells do not demonstrate an order of magnitude increase

The bolded data in the tables is noted as exceeding the site-specific GWQC's for lead (10ug/l) and zinc (36.7 ug/l) as determined by calculating their arithmetic means from data reported in a 3-year study. Trichloroethylene levels are compared to the New Jersey limit of 1.0 ppb. Please note:

- MW-3 continues to show elevated lead and zinc, as has been historically noted and MW-4 contains slightly elevated zinc;
- MW-72, MW-73 and MW-74 were the only other wells, this quarter, that showed slightly elevated total (but not dissolved) lead, as has been historically noted;

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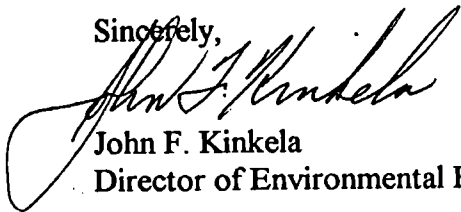
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- MW-17, MW-25, MW-31, MW-72, MW-73 and MW-74 showed slightly elevated levels of zinc, as has been historically noted;
- Of the fifteen (15) wells sampled for TCE this quarter, eleven (11) were somewhat higher than last quarter. Five (5) downgradient sentinel wells, MW-75, MW-76, MW-77, MW-78, and MW-79A were elevated. The higher levels may be due to a seasonal anomaly and thus return to normal levels during the next several rounds.
- A complete operations and maintenance checkup of the remediation system was performed in October 1999. This included running pump curves on all six active remediation wells, backflushing the carbon columns and recalibrating the flow meter. No problems were found.
- GAC Treatment System influent and mid-point water contained a low level (less than background) of total (4.0ug/l) lead. Only the influent contained dissolved (2.0ug/l) lead. Lead was not detected in the effluent samples.
- The GAC Treatment System influent, mid-point and effluent water samples contained slightly elevated zinc levels. This is attributed to the higher zinc levels previously observed in B-31 and other wells.
- The volatile organic compounds cis-1,2-dichloroethene (6 wells up to 2.6ug/l), trans-1,2-dichloroethene (1 well at .26ug/l) and 1,1-dichloroethene (1 well at .21ug/l) were detected in some of the fifteen (15) monitoring wells. They were not detected in the GAC water samples.
- MW-10, MW-12S, MW-13, MW-15, MW-25, B-31, B-59, MW-75, MW-76, MW-77, MW-78, MW-79A, MW81 and the GAC treatment system influent show elevated TCE, as has been historically noted. This is the third elevated result for MW-81.

Please call (609) 965-8272 if there are any questions.

Sincerely,



John F. Kinkela
Director of Environmental Engineering

Enclosures: -Pomona DGW and TCE Quarterly Groundwater Monitoring Report – July 1999
Monitoring Round
-Summary of Inspection Logs – May through July Quarter
-Calculations and Results - Mann-Whitney U Test

cc: J.H. Ennis (w/attachments)
L.A. Fantin, Lenox (w/attachments)
Andrew Park (w/attachments)
File